REMARKS

Claims 1-36 are pending in the present application.

This is in response to the final Office Action mailed July 13, 2004. In the Office Action, the Examiner rejected claims 1-36 under 35 U.S.C. §102(e). Reconsideration in light of the remarks made herein is respectfully requested.

Rejection Under 35 U.S.C. § 102

1.   In the Office Action, the Examiner rejected claims 1-36 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,581,108 issued to Denison et al. ("Denison"). Applicants respectfully traverse the rejection and contend that the Examiner has not met the burden of establishing a prima facie case of anticipation. As the Examiner may be aware, to anticipate a claim, the reference must teach every element of the claim. "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." Vergegaal Bros. v. Union Oil Co. of California, 814 F.2d 628, 631, 2 USPQ 2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the...claim." Richardson v. Suzuki Motor Co., 868 F.2d 1226, 1236, 9 USPQ 2d 1913, 1920 (Fed. Cir. 1989). Applicants reiterate the arguments presented in the previous response.

Denison discloses managing multiple private data networks using network and payload address translation. A router scans all incoming packets. It forwards a packet to a Management Payload Address Translator (MPAT) located externally to the router (Denison, col. 3, lines 3-6; Figure 1) if the packet is determined to be an SNMP packet (Denison, col. 3, lines 17-26). The MPAT next scans all relevant data in a given redirected SNMP, parses the ASN.1 encoding used by the SNMP, and detects data that is an IP address (Denison, col. 3, lines 33-37). The parsing process checks to see if the data corresponds to an IP address, an object identifier (OID), or a sequence (Denison, col. 4, lines 10-13; lines 52-54).

Denison does not disclose, either expressly or inherently, (1) a table to store entries obtained from a description file, (2) the entries including a first connection identifier corresponding to the first network, (3) a parser to parse the packet using the table, and (4) the parser extracting the first connection identifier as recited in claims 1, 13, 25, and 31. As

discussed above, <u>Denison</u> merely discloses the router scanning the packets by the router and the MPAT scanning the redirected packet. The MPAT scans the redirected packet to determine if the data is an IP address, an OID, or a sequence. The parsing is performed on the re-directed packet without the use of a table of entries. Furthermore, this process does not involve obtaining the entries from a description file of the packet.

In the final Office Action dated July 17, 2004, the Examiner contends that <u>Denison</u> discloses an MPAT for performing address translation utilizing a table (MIB). The Examiner further states that the MIB is the Management Information Base which is a table of entries based on a description file which utilizes the SNMP protocol (<u>final Office Action</u>, page 5, paragraph 1). Applicants respectfully disagree for the following reasons.

Applicants note that the Examiner's arguments are inconsistent. The Examiner first states that <u>Denison</u> discloses the IP translation table as the table recited in claims 1, 13, 25, and 31 (final Office Action, page 2, paragraph I). Then, the Examiner states that MIB is the table (final Office Action, page 5 paragraph 1). However, as will be discussed below, neither the IP translation table nor the MIB is the table having a plurality of entries obtained from a description file as recited in claims 1, 13, 25, and 31.

The Management Information Base (MIB) is a database or collection of formally described objects, each of which represents a particular type of information. MIB objects can be accessed and managed with the Simple Network Management Protocol (SNMP) through a network management system. This collection of objects contains information required by a management system and the information is stored as a set of MIB variables. A database is not a table. Furthermore, the MIB does not have entries including a first connection identifier and/or obtained from a description file. In addition, <u>Denison</u> merely discloses that the MPAT can support translation of MIB-based documents (<u>Denison</u>, col. 3, lines 41-43), not parsing the packets using the MIB.

Similarly, the IP translation table is not a table having a plurality of entries obtained from a description file. The IP translation table is used to look up an IP address (<u>Denison</u>, col. 6, lines 10-18). It is not used to parse the sequence of packets as recited in claims 1, 13, 25, and 31.

More importantly, <u>Denison</u> explicitly describes the parsing without using a table. The MPAT scans the relevant data in a given packet, then parses the ASN.1 encoding used by the

SNMP, and detects data that is an IP address (Denison, col. 3, lines 34-37). The parsing algorithm makes use of the ASN.1/BER-encoding used by the SNMP to search for either an IP address type or predefined object Identifiers (OIDs) (Denison, col. 4, lines 15-17). Accordingly, the MPAT scans and parses directly on the packet, not using a table.

Therefore, Applicants believe that independent claims 1, 13, 25, 31 and their respective dependent claims are distinguishable over the cited prior art references. Accordingly, Applicants respectfully request the rejection under 35 U.S.C. §102(e) be withdrawn.

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Reply to Office action of July 13, 2004

Conclusion

Applicants respectfully request that a timely Notice of Allowance be issued in this case.

Respectfully submitted,

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                                                                                  August 30, 2004

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